

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

FIRST-CLASS MAIL AND PERIODICALS  
SERVICE STANDARDS CHANGES, 2021

DOCKET No. N2021-1

**MAILERS HUB  
REVISED INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENT  
UNITED STATE POSTAL SERVICE WITNESS CURTIS WHITEMAN  
(MH/USPS-T-2-1)  
(May 12, 2021)**

Pursuant to the Postal Regulatory Commission's *Rules of Practice and Procedure* (39 CFR 3010.311), Mailers Hub respectfully submits the following revised interrogatories, numbered (MH/USPS-T2-1-3), to United States Postal Service witness Curtis Whiteman (USPS-T-2) and requests a timely answer under oath. If an interrogatory can be more accurately answered by a different witness, we request that it be redirected accordingly or, if necessary, to the Postal Service for an institutional response.

Please contact the undersigned with any questions.

Respectfully submitted

/s/ Leo F. Raymond  
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MAILERS HUB INTERROGATORIES TO  
UNITED STATES POSTAL SERVICE WITNESS CURTIS WHITEMAN (USPS-T-2)  
(MH/USPS-T2-1-3)

**MH/USPS-T2-1.** Please refer to your testimony on page 8, lines 10 through 14.

a. Please explain the statement that the “service standard change will result in a restructuring of the Postal Service’s transportation network,” specifically to clarify whether the Postal Service’s decision to transport more mail by surface necessitated revising service standards, or whether the revised service standards were developed first and, in turn, drove changes in the transportation network.

b. Please define the proportions of “Inter-Area, Inter-Cluster, and Inter-P&DC highway capacity” that are currently served by contracted (HCR) and internal (MVS) transportation, and how those proportions will change under the Postal Service’s proposed service standards.

c. Please confirm that “There will be no immediate change in the capacity of transportation connecting the Postal Service’s Network Distribution Centers (NDCs)” because all non-time-sensitive Periodicals, Marketing Mail, and packages products currently entered at and/or processed through the NDC network will continue to be entered at and/or processed by the NDCs.

d. If not confirmed, please explain how non-time-sensitive Periodicals, Marketing Mail, and packages products currently entered at and/or processed through the NDC network will be entered at and/or processed by the NDCs or elsewhere under the proposed service standard changes and/or related transportation changes.

e. Please confirm that no zoned rates or destination entry discounts currently available based on mail entry or processing through the current NDC network will be changed because of the proposed service standard changes or related network adjustments.

f. If not confirmed, please explain the changes in zoned rates or destination entry discounts that will result from the proposed service standard changes and/or related network adjustments.

**MH/USPS-T2-2.** Please refer to your testimony on pages 10 and 11.

a. Please explain whether the Postal Service has evaluated aggregating its air transportation into a single contract to obtain a more favorable price per pound or cubic foot flown or, if not, why not.

b. Please explain the advantages and/or disadvantages of using multiple contract air transportation providers versus contracting for a single dedicated air transportation provider.

c. Please confirm that the performance by air service providers has contributed to the Postal Service's interest in moving more mail by surface transportation.

d. Please explain whether and how air transportation provider performance, under current service standards or under the proposed service standards, was factored into the air transportation cost calculations.

**MH/USPS-T2-3.** Please refer to Part II of Witness Hagenstein's testimony and your testimony on Pages 11 through 13.

a. Please confirm that the calculated savings in surface transportation assumed

- 1) all vehicles (trucks) would be the same size, with the same capacity;
- 2) cube utilization would be 45.1% of the capacity of a 53-foot trailer;
- 3) loads would consist solely of APCs with an average utilization of 75%; and
- 4) no loads would be in other containers or bedloaded.

b. If those assumptions cannot be confirmed please explain what assumptions were used.

c. Please confirm that the use of smaller trucks ("5-tons"), or different size trailers (40-, 45-, 48-, or 50-foot) were not used as alternatives in the model.

d. If the use of smaller trucks or trailers was not modeled, please explain the reasons why.

e. Please explain whether and how surface transportation provider performance, under current service standards or under the proposed service standards, was factored into the surface transportation cost calculations.